

DEBORAH J. BLUM, ESQ.

225 Broadway, Suite 715 • New York, NY 10007

T • (646) 535-2586

M • (845) 304-5312

F • (212) 409-8279

Patrick Fan, MBA *Legal Intern*
Ariella Ruben *Legal Assistant*

September 22, 2024

Via CM/ECF

The Hon. Nicholas G. Garaufis
Senior United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: KEITH ALAN RANIERE v. UNITED STATES OF AMERICA
Case Nos. 1:18-CR-00204 & 1:24-CV-02925
Final Request for Extension of Time to Amend Pro Se Motion to Vacate
Under 28 U.S.C. § 2255 On Consent

Dear Hon. Judge Garaufis:

I am writing to request an additional extension of Mr. Raniere's 2255 deadline, on consent of the Government, from October 7th to October 31st, 2024.

My mother, Helen C. Blum, has been battling on and off with cancer since 2016. Her stage 4 cancer, sarcomas in her liver, returned this summer. She has had multiple lengthy surgeries and adverse reactions to chemotherapy. She was treating with a chemo medication, as prescribed by her treating oncologist, Dr. Brian Kim, MD, Englewood Health Physician Network, and it likely caused her to recently have an infection in her colon (which is where her cancer originated). She has not been well throughout the summer but things significantly worsened as Labor Day approached. Since then, and prior, I have had to focus on overseeing her care and that of my father. I am an only child.

My father, Stanley Blum, despite being relatively young, has advanced dementia. His treating neurologist is Dr. James H. Ko, MD, Englewood Health Physician Network. He requires constant assistance and is unable to do basic tasks and self-care on his own.

My mother has been hospitalized at Englewood Hospital since September 13th. She had surgery with Dr. Michael Marco, Englewood Health Physician Network, on

September 18th. See attached physician's letter. I have been living with my father since September 13th and handling all aspects of his care and upkeep.

Due to these circumstances, I have been unable to spend the requisite amount of time on Mr. Raniere's matter. I need to have one more visit with him at USP Tucson and cannot do so until my mother is in a better condition to care for my father or finally agrees to hire an aide for him. I have begun my efforts to schedule a firm date for the visit but it has yet to be finalized.

My sincere apologies to the Court for this additional request and thank you to Deputy Chief, AUSA Nicholas Moscow, for consenting to this request. I can best be reached on my mobile phone, (845) 304-5312 or through email, deborah@deborahjblum.com.

Very truly yours,



Deborah J. Blum

w/encs.

Via Email

cc: Joseph Reccoppa
Courtroom Deputy to
The Hon. Judge Nicholas G. Garaufis

Nicholas J. Moscow, Esq.
Deputy Chief, Criminal Appeals
United States Attorney's Office for The Eastern District of New York



ENGLEWOOD HEALTH PHYSICIAN NETWORK

September 18, 2024

RE: Deborah Blum

To whom it may concern,

The above, is the daughter of a patient of mine, who was admitted to The hospital 9/13/24. She will be undergoing major surgery today and will Require assistance from her primary care giver, (Deborah) for the next couple of weeks.

If you should have any questions, feel free to contact my office.

Sincerely,

A handwritten signature in black ink that reads "Michael Marco M.D."

Michael Marco, M. D.